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13 *[Additional counsel listed in signature block]*

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 JANE DOE, individually and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 v.

20 THE REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA d/b/a UCSF MEDICAL
CENTER,

22 Defendant.

Case No.: 3:23-cv-00598-WHO

Honorable Judge William H. Orrick,

**JOINT CASE MANAGEMENT
STATEMENT**

Date: 03/04/2025

Time: 2:00 p.m.

Location: Zoom

Action Filed: 07/25/2022

FAC Filed: 06/06/2023

SAC Filed: 09/25/2024

1 Plaintiff Jane Doe (“Plaintiff”) and Defendant The Regents of the University of California
2 d/b/a UCSF Medical Center (the “Regents,” and together with Plaintiff, the “Parties”), by and
3 through their respective counsel of record, met and conferred regarding this Joint Case Management
4 Statement, which they submit in advance of the Further Case Management Conference scheduled
5 in the above-captioned case for March 4, 2025 at 2:00 P.M. before the Honorable William H.
6 Orrick.

7 ***Meet and Confer Efforts.*** In order to streamline meet and confer efforts and maintain
8 progress of this case, the Parties have agreed to meet and confer every three weeks to raise and
9 discuss outstanding discovery (including document production and depositions) and any other
10 issues or topics the Parties may need to discuss.

11 ***Written Discovery.*** On August 26, 2024, Plaintiff served Requests for Production of
12 Documents by the Regents – Set Two (“Second RFPs”). The Regents served its Objections and
13 Responses to the Second RFPs on September 25, 2024, after which the Parties met and conferred
14 regarding same. On February 4, 2025, the Regents served its Amended and Supplemental
15 Objections and Responses to the Second RFPs. The Parties are continuing to meet and confer in
16 good faith regarding additional documents and information Plaintiff seeks through the Second
17 RFPs.

18 ***Document Productions.*** Since the last Status Conference, the Regents produced documents
19 on September 27, 2025 and January 31, 2025.

20 ***Depositions.*** On February 14, 2025, Plaintiff served her Notice of Rule 30(b)(6) Deposition
21 (“Depo Notice”), which identifies 28 matters for examination. The Parties are meeting and
22 conferring in good faith regarding the scope of the deposition and scheduling.

23 ***Settlement Discussions.*** The Parties are exploring the potential for mediation in this matter,
24 and on February 14, 2025, Plaintiff served a settlement demand.

25 ***New Case Schedule.*** As set forth in the Parties’ February 24, 2025 Joint Stipulation and
26 [Proposed] Order Extending the Case Schedule [ECF No. 88] (“Stipulation”), in order to
27 accommodate the Parties’ need to complete discovery, the Parties requested an extension of the
28

case schedule by 6 months. That same day, the Court approved the Stipulation and ordered the following schedule [ECF No. 89]:

Event	Current Deadline
Fact Discovery Deadline	9/17/2025
Motion for Class Certification	11/14/2025
Expert Depositions	1/5/2026
Class Certification Opposition	2/18/2026
Rebuttal Expert Depositions	4/1/2026
Expert Discovery Deadline	4/1/2026
Class Certification Reply	4/1/2026
Class Certification Hearing	4/22/2026 at 2:00 p.m.

The Parties have also agreed that, depending on the outcome of further discovery and depositions, a further extension of the case schedule may be necessary and have therefore agreed to meet and confer in good faith to propose a further extension of the case schedule for the Court's consideration if necessary.

Dated: February 25, 2025

By: /s/ Amanda Fiorilla

LOWEY DANNENBERG, P.C.

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THE UNIVERSITY OF CALIFORNIA d/b/a
UCSF MEDICAL CENTER

CIVIL L.R. 5-1(h)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I, Dyanne J. Cho, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: February 25, 2025

BAKER & HOSTETLER LLP

By: /s/ Dyanne J. Cho
Dyanne J. Cho

BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
LOS ANGELES